

To: Scott Kluska[skluska@cteh.com]; David Cawthon[dcawthon@cteh.com]; johnpavlicek@garner-es.com[johnpavlicek@garner-es.com]
Cc: Peronard, Paul[Peronard.Paul@epa.gov]; dglatt@nd.gov[dglatt@nd.gov]; Rockeman, Karl H.[krockema@nd.gov]; stillots@nd.gov[stillots@nd.gov]; sradi@nd.gov[sradi@nd.gov]
From: Roberts, Kris D.
Sent: Mon 8/18/2014 1:11:59 PM
Subject: RE: Red River Supply - Interim Remedial Action Plan

Mr. Kluska:

I have reviewed the sampling and contaminated soil excavation plan submitted with your email below.

Your pre-excavation soil sampling plan appears adequate for initial site characterization. However, it may not be sufficient for waste characterization, for disposal destination purposes. Please confer with your disposal facility and our Waste Management Division on that matter.

Your excavation plan appears acceptable to the department, unless unexpected situations arise, in which case you will need to discuss any needed changes with us immediately.

Your confirmation sampling and analysis plan is comprehensive and acceptable in your gridded areas. In the fire runoff paths and accumulation areas, as depicted in the early site photographs, Paul Peronard and I verbally discussed a sampling plan with Jeff LaRock. From the time period when we did that, the samples there may already be collected, and analyses possibly back. Please let me know if that is the case, and forward those analytical results to me ASAP, as well as those taken previously in that area of the exclusion zone on the Schlumberger property.

As I indicated in an earlier e-mail this morning, your request for soil cleanup standards are problematic in this case. While there are some guidelines that the department uses in cases of petroleum hydrocarbon/fuel releases, and some US EPA PRGs (preliminary remediation guidelines), a fire situation such as this must rely most heavily on what was in the warehouse at the time of the fire, and what may be residual. The Department will review the information from your pre-excavation and confirmation sampling, and make necessary determinations based on that. Therefore, please submit the analytical results as quickly as possible so that we may review, and work with Red River Supply, Garner, and CTEH in any further sampling and analytical work required, including previously discussed groundwater assessment.

If you have any questions, please contact me.

Kris Roberts

Environmental Response Team Leader

ND Department of Health

Division of Water Quality

918 E. Divide Ave, 4th Floor

Bismarck, ND 58501-1947

701-328-5236 (off.)

701-391-0982 (cell)

kroberts@nd.gov

From: Scott Kluska [mailto:skluska@cteh.com]

Sent: Thursday, August 14, 2014 3:03 PM

To: Peronard.Paul@EPA.Gov; Roberts, Kris D.

Subject: Red River Supply - Interim Remedial Action Plan

Importance: High

Paul / Kris,

Attached is the Draft Interim Remedial Action Plan for the Red River Supply – Williston, ND

fire site. Please review and let me know if you have any questions or comments.

Thanks

Scott Kluska

Sr. Consultant

Center for Toxicology and Environmental Health, LLC (CTEH)

5120 North Shore Drive

North Little Rock, AR 72118

Office: 501-801-8500

Cell: 908-399-8875

1-866-869-2834 [24-HOUR ER Help Desk]

www.cteh.com